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July 17, 2024

VIA CM/ECF

Honorable Michael A. Shipp, U.S.D.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *GPI, LLC v. Rapsys Incorporated, et al.*
Case No. 3:22-cv-04585-MAS-TJB

Dear Judge Shipp:

This firm represents Plaintiff GPI, LLC ("GPI") in this matter. As you are aware, on March 18, 2024, this matter was stayed due to the Defendant Rapsys Incorporated d/b/a Geese Police of Naperville's ("Defendant") Chapter 11 bankruptcy filing in the United States Bankruptcy Court for the Northern District of Illinois. (Dkt. 58).

I write to advise that on July 17, 2024, the Honorable David D. Cleary, United States Bankruptcy Judge for the Northern District of Illinois, issued an Order modifying the automatic stay so as not to restrain the parties from proceeding specifically with respect to this matter. A copy of Judge Cleary's Order is enclosed herein.

Please be advised that, pursuant to Fed. R. Bankr. P. 4001(a)(3), the Order itself is stayed until the expiration of 14 days after the entry of the Order, or July 31, 2024. Accordingly, GPI respectfully requests that upon the expiration of the 14-day period, this case be reopened. GPI further requests that the Motion for a Preliminary Injunction, (Dkt. 5), and the Motion for a Permanent Injunction, (Dkt. 43), be restored to the active motion calendar.

We greatly appreciate the Court's attention to this matter, and as always, please let us know if you would need any further information.

Respectfully submitted,

/s/Jacqueline M. Weyand
Jacqueline M. Weyand

cc: All Counsel of Record (via CM/ECF only).

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

In Re:)	BK No.: 24-03481
Rapsys, Inc.)	
)	
)	Chapter: 11
)	Honorable David D. Cleary
)	
Debtor(s))	

Order For Relief from the Automatic Stay

This matter coming for hearing on the motion of GPI LLC for relief from the automatic stay, the Court having the power and authority over the parties and the subject matter, and for the reasons set forth on the record;

IT IS HEREBY ORDERED: 1. that the Motion is GRANTED, and 2) the automatic stay is modified so as not to restrain the parties from proceeding as to (A) the arbitration proceeding captioned GPI, LLC vs. Rapsys Incorporated, et al., Ref. No. 5425001036 now pending before JAMS and Arbitrator Lisa Love; and (B) the civil action captioned GPI, LLC v. Rapsys Incorporated, et al., Case No. 3:22-cv-04585-MAS-TJB now pending in the U.S. District Court for the District of New Jersey.

Enter:



Honorable David D. Cleary
United States Bankruptcy Judge

Dated: July 17, 2024

Prepared by: